



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

JJD:JLG  
F. #2015R01885

*610 Federal Plaza  
Central Islip, New York 11722*

March 20, 2019

By Federal Express and ECF

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Re: United States v. Christopher McPartland and Thomas J. Spota  
Criminal Docket No. 17-587 (JMA)

Dear Counsel:

Enclosed please find the government's supplemental discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure.

The enclosed hard-drive is being produced pursuant to the terms of the parties' March 19, 2019 Stipulation and Order (the "Protective Order"). The materials contained herein have been stamped with control numbers SCDA 0000000001 through SCDA 000516527, and consist of the electronically-saved files, e-mails, and calendars maintained by the Suffolk County Department of Information Technology for the time period between and including December 14, 2012 and December 31, 2017, relating to the following individuals: Thomas Spota, Christopher McPartland, [REDACTED], [REDACTED], [REDACTED], James Burke, [REDACTED], [REDACTED] and [REDACTED].<sup>1</sup>

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<sup>1</sup> Any materials that may be subject to the attorney-client privilege with respect to any of the listed individuals have been segregated, for further review by a taint team. If

These materials are being provided to you via a third party data hosting and processing company. Additional materials will be provided on a rolling basis, as they become available.

Very truly yours,

RICHARD P. DONOGHUE  
United States Attorney

By: /s/  
John J. Durham  
Lara Treinis Gatz  
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Assistant U.S. Attorneys  
(631) 715-7851/-7913/-7835

Enclosure.

cc: Clerk of the Court (JMA) (by ECF) (*redacted*) (without enclosure)

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and when such materials are deemed non-privileged, they will be produced on a rolling basis as that determination is made.